

John D. Fiero (CA Bar No. 136557)
PACHULSKI STANG ZIEHL & JONES LLP
One Sansome Street, 34th Floor, Suite 3430
San Francisco, CA 94104
Telephone: (415) 263-7000
Facsimile: (415) 263-7010
E-mail: jfiero@pszjlaw.com

*Attorneys for Michael Goldberg,
Trustee of the PFI Trust*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re
PROFESSIONAL FINANCIAL
INVESTORS, INC., *et al.*,
Debtor.

Case No. 20-30604
(Jointly Administered)

Chapter 11

Michael Goldberg, Trustee of the PFI Trust,
Plaintiff,
v.
Leslie Michelle Wallach, Manuel A. Romero,
and Charlene Albanese,
Defendants.

Adv. Proc. No. 24-03034

**STATUS REPORT AND THIRD
STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO FIRST
AMENDED COMPLAINT**

This Status Report and Third Stipulation for Extension of Time to Respond to First Amended Complaint is entered into by and between Michael Goldberg, the duly appointed Trustee (*“Trustee”* or *“Plaintiff”*), Leslie Michelle Wallach (*“Defendant Wallach”*), Manuel A. Romero (*“Defendant Romero”*), and Charlene Albanese (*“Defendant Albanese”*) by and through the undersigned attorneys of record.

///

///

///

1 ///

2
3 **RECITALS**

4 **WHEREAS** Plaintiff filed its *First Amended Complaint for Damages for Breach of*
5 *Fiduciary Duty, And To Equitably Subordinate Claims Pursuant to 11 U.S.C. Section 510(c)(1)*
6 (the “First Amended Complaint”) on February 21, 2025; and

7 **WHEREAS** the Court established in its Summons a responsive pleading deadline to the
8 First Amended Complaint of March 31, 2025; and

9 **WHEREAS**, the parties concluded a successful meditation on June 24, 2025 before the
10 Honorable Craig Karlan; and

11 **WHEREAS** each of the parties has signed a Settlement Agreement with Mutual General
12 Releases that contemplates the execution of a Request for Dismissal With Prejudice as soon as
13 certain consideration changes hands among the parties; and

14 **WHEREAS** the parties expect all such consideration will be exchanged within the next 45
15 days,

16 **NOW, THEREFORE**, the parties hereto stipulate and agree as follows:

17 **STIPULATION**

18 1. The defendants’ response deadline with respect to First Amended Complaint shall
19 be extended indefinitely pending the filing of a Request for Dismissal with Prejudice or such other
20 pleading as any party may choose to advise the Court of the current status of this matter.

21 3. When all consideration has been exchanged and all conditions precedent have been
22 satisfied under the Settlement Agreement, Plaintiff shall promptly file a Request for Dismissal
23 with Prejudice.

24 Dated: June 26, 2025

PACHULSKI STANG ZIEHL & JONES LLP

25 By /s/ John D. Fiero
John D. Fiero

26 *Attorneys for Michael Goldberg,*
27 *Trustee of the PFI Trust*
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: June 25, 2025

FREEMAN, MATHIS & GARY

By /s/ Lynn Dean
Lynn Dean

Attorneys for Charlene Albanese

Dated: June 25, 2025

WINGET, SPADAFORA & SCHWARTZBERG, LLP

By /s/ Alexis King
Alexis King

Attorneys for Leslie Michelle Wallach

Dated: June 25, 2025

TADJEDIN THOMAS & ENGBLOOM LAW GROUP

By /s/ Wendy Thomas
Wendy Thomas

Attorneys for Manuel Romero

STATE OF CALIFORNIA)
CITY OF SAN FRANCISCO)

I, Oliver Carpio, am employed in the city and county of San Francisco, State of California. I am over the age of 18 and not a party to the within action; my business address is One Sansome Street, 34th Floor, Suite 3430, San Francisco, CA 94104-4436.

On June 26, 2025, I caused to be served the following document in the manner stated below:

- STATUS REPORT AND THIRD STIPULATION FOR EXTENSION OF TIME TO RESPOND TO FIRST AMENDED COMPLAINT TO ALLOW FOR MEDIATION***

<input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On June 26, 2025 , I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below
<input type="checkbox"/>	(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. On _____, under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
<input checked="" type="checkbox"/>	(BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on June 26, 2025 at San Francisco California.

/s/ Oliver Carpio
Oliver Carpio

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- John D. Fiero jfiero@pszjlaw.com, ocarpio@pszjlaw.com
- Alexis T. King king.a@wssllp.com, gil-lopez.j@wssllp.com

TO BE SERVED VIA EMAIL:

David Taylor Keller, Benvenuti & Kim LLP Email: dtaylor@kbklp.com <i>Attorneys for Charlene Albanese</i>	Alexis King Winget, Spadafora & Schwartzberg, LLP Email: king.a@wssllp.com <i>Attorneys for Leslie Michelle Wallach</i>
Wendy Thomas Tadjedin Thomas & Engbloom Law Group Email: wendyt@ttelawgroup.com <i>Attorneys for Manuel Romero</i>	Lynn Dean Freeman, Mathis & Gary Email: lynn.dean@fmglaw.com <i>Attorneys for Charlene Albanese</i>